IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION (COLUMBUS)

MATTHEW D. HOOVER :

CASE NO. 2:21-cv-4177

Plaintiff,

•

v.

: PLAINTIFF'S MOTION FOR

4 SEASONS MOTORS INC. : **DEFAULT JUDGMENT AGAINST**

(D/B/A NCC MOTOR SALE) : **DEFENDANTS**

:

and

:

SAMER PHARRA

:

Defendants.

:

:

Pursuant to Fed. R. Civ. P. 55, Plaintiff Matthew D. Hoover ("Plaintiff") moves for default judgment against Defendants 4 Seasons Motors Inc. (d/b/a NCC Motor Sale) and Samer Pharra. The complaint in this case was filed with the Court on September 15, 2021, and the summons and complaint were duly served on Defendants on December 29, 2021 via certified mail. See Dkt. No. 12. Defendants have not filed any responsive pleadings or otherwise appeared in this action. Defendants are not an unrepresented minor or incompetent individual.

On February 11, 2022, the Clerk of Courts entered Default against Defendants under Fed. R. Civ P. 55(a). (See Dkt. No. 13). Accordingly, Plaintiff asks this Court to issue default judgment against Defendants, and schedule a hearing on damages under Fed. R. Civ. P. 55(b).

Respectfully submitted,

/s/ Adam V. Sadlowski

Adam V. Sadlowski, Trial Attorney (0079582) SADLOWSKI LAW LLC 11427 Reed Hartman Highway, Suite 210 Blue Ash, Ohio 45241

Tel: (513) 618-6595 Fax: (513) 618-6442

asadlowski@sb-lawyers.com

Attorney for Plaintiff

CERTFICATE OF SERVICE

I certify that a copy of the foregoing Plaintiff's Motion for Default Judgment Against Defendants has been served on February 11, 2022 upon the following parties via first class, U.S. mail:

4 Seasons Motors Inc. (dba NCC Motor Sale) 5240 Sinclair Rd. Columbus, OH 43229

Samer Pharra (statutory agent) 1871 Kentwell Rd. Upper Arlington, OH 43221

/s/ Adam V. Sadlowski
Adam V. Sadlowski